

2 (b)

PRIVATE

WKC Comments re March 24, 1993 R&R Report

Page 2 (re PCBs)...."but this does not disallow the possibility of more significant areas of concentration at other locations.....". Pure speculation. Not even necessary for PMA!

The last two sentences in the first paragraph are very good and really say it all: "The detected concentrations of TPH.... represents the main environmental concern with regard to the condition of the soil at the site. Depending on the intended use of the site, however, the TPH may not pose a serious environmental risk".

Page 3 Why persist in citing here (and four times elsewhere) a 1.0 standard for barium when 2.0 may be more accurate? Also, they mention lead and then ignore it----by omission of any further comment. Should we assume it is okay? Final sentence is pure speculation regarding the impermeable layer created by perched groundwater zone near MW-8. Sounds like potential trouble----but maybe we should not be worried since we are going to remediate.

Page 10 Why say R&R was "limited to" the following tasks? Why not say "assigned by Hammontree"? In general, all references suggesting that R&R was guided, limited, restricted by CDF are not accurate and should be removed.

Page 24 Reference to shallow borings B-9 through B-15 "as per the request of CDF personnel". I believe that is inaccurate -----that R&R decided to go forward although CDF people may have said something like, "sounds good to us". Again on Page 24, the comment "final approval of all soil samples selected for lab analysis was obtained by CDF personnel".

Page 39 Another reference to 1.0 barium standard.

Page 42 and footnote 5 on page 44 Specific reference to 3.4 result from second test.

Page 46 A very prominent reference to "1.9/3.4" on this map.

Page 47 More emphasis on a second sample at 3.4.

Page 50 Repeated references to a wrong standard (1.0) and that the barium concentration "exceeded the MCL established for barium".

Page 51/53 I realize that PMA's "limitations" statements are inevitable in such documents, but this one really goes beyond reasonable limits. The reference to "client approved scope of work" at a "limited and specific number of locations" which were "at least partially determined by site personnel" characterizes this investigation as representing an initial site characterization and not a complete site evaluation.

Then it goes on to repeat terms like "limited" and "selected analyses" and speculations that "conditions may vary considerably".

It stresses that they did not have the benefit of a "Phase I property evaluation or a compliance audit, which may have revealed additional areas.....".

Still another reference to the client approval, which does not address any "interior areas".

It states that the investigation "specifically does not address any issues regarding...compliancewith environmental laws, permits or other applicable ordinances". It again refers to this as an "initial assessment" and not a "complete or final evaluation".

All of that PMA garbage is then followed with a very accurate statement about the impossibility of ever being sure that all possible environmental concerns at a property have been identified, "regardless of the number of borings or analyses performed". Why so much belaboring of the negative?

EXECUTIVE SUMMARY
CANTON DROP FORGE, INC.
PHASE II
ENVIRONMENTAL
January 25, 1993

1(c), 2(b), 7

- 1.) The purpose of this summary of a Phase II Environmental Site Assessment is to evaluate the environmental soundness of the soil and groundwater within the boundary lines of your facility.
- 2.) Eight (8) monitoring wells were advanced on the site to depths up to 50 feet with generally little or no soil or water contamination. Soil samples for B-5, B-6, and B-8 showed high hydrocarbons ranging from 4400 mg/kg to 6800 mg/kg. No groundwater remediation is indicated.
- 3.) Polychlorinated Biphenyls (PCB's) were found in Test Hole B-6 @ 0.31 mg/kg. PCB #1260 was also found near one of the transformer locations, HB-1, at 0.88 mg/kg. (SDWA - .0005 mg/l). We expect that these compounds are in very limited quantities.
- 4.) A moderate hydrocarbon odor and sheen was found on MW-8. This test well also indicated a concentration of hydrocarbons at 35 mg/kg. OEPA has no established limit at this time.
- 5.) Barium (1.9 mg/l) at MW-8 does not exceed the OEPA limit of 2.0 mg/l although 1.0 mg/l has been proposed. We believe that this material will be remediated along with the hydrocarbon.
- 6.) A water sample from Lagoon #3 was better than current safe drinking water regulations.
- 7.) The area around B-8 should be remediated. Bio-remediation or disposal at a certified landfill are options that are currently available. Additional tests will be required to verify the best process to be used.
- 8.) The sludges in and around the embankments of Lagoons 1 and 2 should be remediated. Bio-remediation or disposal at a certified landfill are options. Additional tests will be required to verify the best process to be used.
- 9.) Industrial pretreatment to treat process water upon the closure of Lagoons 1 and 2 will be required. The effluent will be discharged to the city of Massillon sanitary sewer system.
- 10.) According to USEPA, all storm water discharges are to be permitted and monitored for parameters such as oil and grease, solids, pH, and rate of flow. This can be obtained either through a group or individual permit.

HAMMONTREE & ASSOCIATES, LIMITED

CDF004579

2 (b)

CANTON DROP FORGE, INC.
SUMMARY OF AUDIT ACTION PLAN

Project I - PCB Remediation

Phase A - Conduct soil tests to delineate scope of work required and file action plan with OEPA

Estimated initial OEPA filing by 10/1/93

Phase B - Remediation activity and OEPA approval of final report

Project II - Remediation of Area Near Hole 8

Phase A - Delineate scope of work required, perform feasibility studies and file action plan with OEPA

Estimated initial OEPA filing by 3/1/94

Phase B - Remediation activity, verification tests and OEPA approval of final report

Project III - New Pretreatment System and Lagoon Remediation

Phase A - Process water pretreatment system

Task I - Delineate scope of work required, develop system concept and file action plan with OEPA

Estimated initial OEPA filing by 12/1/93

Task II- Design and construct system and obtain OEPA permit to install

Phase B - Remediation of lagoons 1 and 2

Task I - Remove and properly dispose of oil emulsions

Task II- Determine volume and character of affected materials, perform feasibility studies and file action plan with OEPA

Estimated initial OEPA filing by 3/1/94

Task III-Remediation activity, verification tests and OEPA approval of final report

3/24/93

CDF004581



CLEVELAND
TECHNICAL
CENTER

18419 EUCLID AVENUE • CLEVELAND, OHIO 44112-1016 • (216) 383-8200

267

SPECTRA CHECK FUEL TEST REPORT

TO: MR. RON DECKER
CANTON DROP FORGE
P O BOX 6902
CANTON OH 44706

LAB NO: 8-539
CLIENT NO: 15971-00
TEST DATE: 08-23-90
P. O. NO: 83570

TYPE OF SAMPLE: OIL

SAMPLE IDENTIFICATION: OIL SAMPLE FROM WEST POND

SAMPLE DATE: UNKNOWN

API GRAVITY @ 60 F = 13.6

VISCOSITY @ 122 F (ASTM D-445) = 5,504 SUS

% SULFUR (ASTM D-4294) = 0.45%

% WATER (ASTM D-96) = 30.6%

% SEDIMENT (ASTM D-96) = 33.0%

POUR POINT (ASTM D-97) = +35 F

FLASH POINT (PMCC) (ASTM D-93) = 168 F

% ASH CONTENT (ASTM D-482) = 1.47%

BTU CONTENT (ASTM D-2382) = SAMPLE 30% WATER. SAMPLE WON'T IGNITE.

**CANTON DROP FORGE**

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902 • CANTON, OHIO 44706

26b)

PURCHASE ORDER

No. 83570

THIS ORDER NUMBER MUST
APPEAR ON ALL INVOICES,
PACKING SLIPS, B/L AND
PACKAGES.

TO

Cleveland Technical Center
18419 Euclid Ave
Cleveland, Oh 44112
Attn: Don Rance
8212 - S/L

PHONE 216-477-4511

FAX 216-477-2046

ACCT. NO.	TERMS	VIA	F.O.B. <input type="checkbox"/> DELIVERED <input type="checkbox"/> SHIPPING POINT	DATE
QUANTITY	DESCRIPTION			8/24/90
	Oil sample from west pond to have oil analyzed for the following: Gravity API @ 60°F Viscosity SSF @ 122°F Flash, of (Closed cup) Bottom, sediment & water (BSW') % by weight Pour point of ash % by weight sulfur % by weight BTU's per gallon sample in your possession sent - 8/17/90			

TMC

We accept your order, including the instructions and conditions on the face hereof and on the reverse side hereof, for the above material at prices stated, and will make shipment according to the delivery schedule on the order or as follows:

SIGNED VENDOR Cleveland Tech. Ctr.**CANTON DROP FORGE**

CDF004583

SHIPPING DATE Upon Request

ACKNOWLEDGMENT

AUTHORIZED BY

J A Rance

No. 83570

**CANTON DROP FORGE**

HIGH PERFORMANCE CLOSED DIE FORGINGS

4575 SOUTHWAY ST., S.W. • P.O. BOX 6902 • CANTON, OHIO 44706

PURCHASE ORDER

No. 82889

THIS ORDER NUMBER MUST
APPEAR ON ALL INVOICES,
PACKING SLIPS, B/L AND
PACKAGES.

TO

Cleveland Technical Center
18419 Euclid Ave.
Cleveland, OH 44112

PHONE 216-477-4511

TWX 810-432-9084

383-8200

ACCT. NO.	TERMS	VIA	F.O.B.	DATE
0-20 B-22	Net		<input type="checkbox"/> DELIVERED <input type="checkbox"/> SHIPPING POINT	4/26/90
QUANTITY	DESCRIPTION			PRICE
2 Samples	Analysis on Waste Oil from West Pond: Service "2" Analysis PCB Analysis Sulfur Analysis			15.00 ea 95.00 ea 17.50 ea
2 Samples	Analysis on used Hydrawlic Oil: PCB Analysis			95.00 ea
(Samples delivered to CTC on 4/26/90 - c/o Don Krance)				
LLS				

DATE	INVOICE - DATE	RECEIVED
6/15/90	060052-10-6/7/90-(1-2)-442.90	

CDF004584

CLEVELAND TECHNICAL CENTER

18419 EUCLID AVENUE • CLEVELAND, OHIO 44112-1016 • (216) 383-8200



PARENT NO.	CLIENT NO.	UNIT NO.	UNIT TYPE	OTHER
15971	00	90-28		269

DESCRIPTION **WASTE OIL**
West Pond
MAKE _____ MODEL _____
UNIT SERIAL NO. #1 WASTE OIL FROM WEST POND

OIL BRAND
OIL TYPE
FUEL TYPE

NUMBER COPIES 1
TYPE SERVICE 2

SAMPLE DATA

LAB#	DATE TAKEN/TESTED	HRS/MI OIL UNIT
------	-------------------	-----------------

29146 26APR90
11MAY90

SPECTROCHEMICAL ANALYSIS
VALUES EXPRESSED IN PARTS PER MILLION (PPM) BY WEIGHT

IRON	CHROMIUM	LEAD	COPPER	TIN	ALUMINUM	NICKEL	SILVER	MANGANESE	SILICON	BORON	SODIUM	MAGNESIUM	CALCIUM	BARIUM	PHOSPHORUS	ZINC	MOLYBDENUM	TITANIUM	VANADIUM	CADMIUM
------	----------	------	--------	-----	----------	--------	--------	-----------	---------	-------	--------	-----------	---------	--------	------------	------	------------	----------	----------	---------

82 6 1 2 0 24 5 0 5 33 0 23 25 290 6 45 3 0 4 0 0

PHYSICAL PROPERTY DATA

FLASH	FUEL	VIS 40°C	VIS 100°C	WATER	SOLIDS	GLYCOL
% Vol	% Vol	cSt	cSt	% Vol	% Vol	

N/A N/A 196.9 N/A 3.53 0.8 N/A

ADDITIONAL CUSTOMER TESTS

LAB#	PCB	SULFUR							
------	-----	--------	--	--	--	--	--	--	--

29146 (1PPM 0.37%

ANALYSIS RECOMMENDATIONS

--

ANALYSIS RECOMMENDATIONS

29146 TEST RESULTS INDICATE EXCESSIVE WATER PRESENT. NOTE: MAJOR ELEMENTS PRESENT INDICATED BY UNDERLINE.
--

RON DECKER
CANTON DROP FORGE
P O BOX 6902
CANTON OH 44706

WHEN CORRECTIVE ACTION IS INDICATED, PLEASE ADVISE RESULTS OF YOUR FINDINGS AND CORRECTIVE ACTION TAKEN ON ENCLOSED FORM.

Since Spectra-Check services are based on samples and information supplied by others, and since corrective action, if any, is necessarily taken by others, these services are rendered without any warranty or liability of any kind beyond the actual amount paid to Cleveland Technical Center for the services.



**CLEVELAND
TECHNICAL
CENTER**

13600 DEISE AVENUE • CLEVELAND, OHIO 44110-2196 • (216) 451-6455

2(b)

SPECTRA CHECK TEST REPORT



TO: CANTON DROP FORGE
ATTN: RON DECKER
P O BOX 6902
CANTON OH 44706

LAB NO: 5-351 & 5-352

CLIENT NO: 15971-000

TEST DATE: 05-11-90

P.O. NO: 82889

TYPE OF SAMPLE: USED HYDRUALIC OIL

SAMPLE DATE: 04-26-90

SAMPLE DATA

90-30
#1 USED

90-31
#2 USED

PCB CONTENT

<1 PPM

<1 PPM

JUN-29-89 TUE 10:10 CLEVE. TECH. CTR.



CLEVELAND TECHNICAL CENTER

13600 DEISE AVENUE • CLEVELAND, OHIO 44110-2196 • (216) 451-6455



PARENT NO.	CLIENT NO.	UNIT NO.	UNIT TYPE	OTHER
15971	00	UNKNOWN		269

DESCRIPTION **WASTE OIL - West Pond**

MAKE

MODEL

OIL BRAND

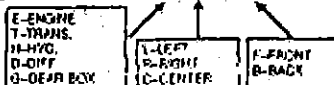
OIL TYPE

FUEL TYPE

NUMBER COPIES

TYPE SERVICE 2

UNIT SERIAL NO.



SAMPLE DATA		
LAB#	DATE TAKEN/TESTED	HRS/AM OIL UNIT
58365	24MAY89 19JUN89	

SPECTROCHEMICAL ANALYSIS																					VALUES EXPRESSED IN PARTS PER MILLION (PPM) BY WEIGHT																				
IRON	CHROMIUM	LEAD	COPPER	TIN	ALUMINUM	NICKEL	SILVER	MANGANESE	SILICON	BORON	SODIUM	MAGNESIUM	CALCIUM	BARIUM	PHOSPHORUS	ZINC	MOLYBDENUM	TITANIUM	VANADIUM	CADMIUM																					
8954	101	137	111	14	999	71	0	11	2016	2	103	360	854	65	152	290	15	41	21	0																					

PHYSICAL PROPERTY DATA											
FLASH	FUEL	VIS 40°C	VIS 100°C	WATER	SOLIDS	GLYCOL					
310	N/A	N/A	N/A	23.5	4.0	NB					

ADDITIONAL CUSTOMER TESTS									
LAB#									
58365									

--	--	--	--	--	--	--	--	--	--

ANALYSIS RECOMMENDATIONS									
LAB#									
58365									

ANALYSIS RECOMMENDATIONS									
LAB#									
58365	TEST RESULTS INDICATE EXCESSIVE WATER PRESENT. NOTE: SILICON LEVEL APPEARS TO BE HIGH. NOTE: TEST RESULTS INDICATE THE PRESENCE OF EXCESSIVE INSOLUBLES. NOTE: WEAR METAL LEVEL(S) APPEAR TO BE HIGH.								

CDFO04587

RON DECKER
CANTON DROP FORGE
P O BOX 6902
CANTON OH 44706

WHEN CORRECTIVE ACTION IS INDICATED, PLEASE ADVISE RESULTS OF YOUR FINDINGS AND CORRECTIVE ACTION TAKEN ON ENCLOSED FORM

2 (6)

**CLEVELAND TECHNICAL CENTER**

A DIVISION OF CONAM INSPECTION INC

18419 Euclid Avenue
Cleveland, Ohio 44112-1018
(216) 383-8200
FAX (216) 383-9633

**SPECTRA CHECK FUEL TEST REPORT**

TO: RON DECKER
CANTON DRAP FORGE
P O BOX 5902
CANTON OH 44706

LAB NO: 09-381

CLIENT NO: 13371-00

TEST DATE: 09-16-91

P. Q. NO: 85890

TYPE OF SAMPLE: WASTE OIL

SAMPLE IDENTIFICATION: 19,000 GALLON WEST POND OIL

SAMPLE DATE: 08-30-91

API GRAVITY @ 60 F = 14.1	NICKEL = <1 ppm
% SULFUR (ASTM D-4294) = 0.23%	ARSENIC = <1 ppm
% WATER (ASTM D-96) = 50%	CADMIUM = <1 ppm
% SEDIMENT (ASTM D-96) = 31%	CHROMIUM = <1 ppm
POUR POINT (ASTM D-97) = +45 F	LEAD = 2 ppm .0002%
FLASH POINT (PMCC) (ASTM D-93) = 140 F	PCB's = <5 ppm
% ASH CONTENT (ASTM D-402) = 0.14%	TOTAL HALOGENS = 74 ppm
% BTU CONTENT (ASTM D-2382) = N/A	MERCURY = <1 ppm
	SELENIUM = <1 ppm
	BARIUM = <1 ppm <.0001%
	SILVER = <1 ppm

* NOTE: BTU CONTENT SAMPLE WON'T IGNITE CONTAINS TOO MUCH WATER.

CDF004588

LOCATIONS NATIONWIDE

MAIN LABORATORY LOCATIONS:

CLEVELAND, OH · KANSAS CITY, MO · PHOENIX, AZ · LINDEN, NJ

Expert Lubrication and Fuel Analysis Services

Since Cleveland Technical Center's services may be based on samples and information supplied by others, and since corrective action, if any, is necessarily taken by others, these services are rendered without any warranty or liability of any kind beyond the amount paid to Cleveland Technical Center for the services at issue. All orders are subject to CONAM INSPECTION INC's Standard Terms and Conditions of Sale, which are available upon request.



CLEVELAND TECHNICAL CENTER

13600 DEISE AVENUE • CLEVELAND, OHIO 44110-2196 • (216) 451-6455



PARENT NO.	CLIENT NO.	UNIT NO.	UNIT TYPE	OTHER
15971	00	UNKNOWN		269

DESCRIPTION WASTE OIL - West Pond

MAKE
UNIT SERIAL NO.

MODEL

OIL BRAND
OIL TYPE
FUEL TYPE

NUMBER COPIES 1
TYPE SERVICE 2

E-ENGINE
T-TRANS
H-HYD.
D-DIFF
G-GEAR BOX

L-LEFT
R-RIGHT
C-CENTER

F-FRONT
B-BACK

SAMPLE DATA

LAB#	DATE TAKEN/TESTED	HRS/MI OIL UNIT
------	-------------------	-----------------

58365 24 MAY 89
19 JUN 89

SPECTROCHEMICAL ANALYSIS
VALUES EXPRESSED IN PARTS PER MILLION (PPM) BY WEIGHT

IRON	CHROMIUM	LEAD	COPPER	TIN	ALUMINUM	NICKEL	SILVER	MANGANESE	SILICON	BORON	SODIUM	MAGNESIUM	CALCIUM	BARIUM	PHOSPHORUS	ZINC	MOLYBDENUM	TITANIUM	VANADIUM	CADMIUM
8954	101	137	111	14	999	71	0	11	2016	2	103	360	854	65	152	290	15	41	21	0
~~~~~	~~~~~	↑ PPM			~~~~~				~~~~~					↑ PPM						
		.0137%												.0065%						

PHYSICAL PROPERTY DATA

FLASH	FUEL	VIS 40°C	VIS 100°C	WATER	SOLIDS	GLYCOL
% Vol.	% Vol.	cSt	cSt	% Vol.	% Vol.	

310 N/A N/A N/A 23.5 4.0 NEB  
~~~~~

ADDITIONAL CUSTOMER TESTS

| LAB# |
|------|
|------|

58365

ANALYSIS RECOMMENDATIONS

| LAB# |
|------|
|------|

58365

TEST RESULTS INDICATE EXCESSIVE WATER PRESENT.
NOTE: SILICON LEVEL APPEARS TO BE HIGH.
NOTE: TEST RESULTS INDICATE THE PRESENCE OF EXCESSIVE INSOLUBLES.
NOTE: WEAR METAL LEVEL(S) APPEAR TO BE HIGH.

RON DECKER
CANTON DROP FORGE
P O BOX 6902
CANTON OH 44706

WHEN CORRECTIVE ACTION IS INDICATED, PLEASE ADVISE RESULTS OF YOUR FINDINGS AND CORRECTIVE ACTION TAKEN ON ENCLOSED FORM.

Since Spectra-Check services are based on samples and information supplied by others, and since corrective action, if any, is necessarily taken by others, these services are rendered without any warranty or liability of any kind beyond the actual amount paid to Cleveland Technical Center for the services.

CDFO04589

262

| <u>Sample No</u> | <u>Location</u> |
|------------------|--|
| S <sub>1</sub> | East Bank - Lagoon #1 |
| S <sub>2</sub> | Only pile of scales or cinders - Lagoon #1 |
| S <sub>3</sub> | stained soil near dec. on NW corner of pile |
| S <sub>4</sub> | only area in a low area of Lagoon #3 |
| S <sub>5</sub> | West Bank of Lagoon #3 |
| S <sub>6</sub> | stained soil north of Lagoon 2 |
| S <sub>7</sub> | Bank of Lagoon #2 near pump shed |
| S <sub>8</sub> | stained soil near scrap/salvage area on hill |
| S <sub>9</sub> | potential background sample - grassy area between office & main building |

WKC - Bill, I'll discuss this with you over the phone
on Friday (1/25)

Jerry

2(b)

January 24, 1991

Mr. Bryan Walters
Asset Based Lending
National City Bank
National City Center
P.O. Box 5756
Cleveland, Ohio 44101-0756

Dear Mr. Walters:

I am writing in response to your request for an "estimate" ~~at~~ of the environmental situation at this company's plant. Because any such "estimate" is necessarily based upon factual matters and because the company possesses the best factual knowledge, the company and its attorneys believe that the company is the most appropriate one to respond to your request. I am writing on behalf of the company, therefore, to point out certain facts relative to the environmental situation at the company's plant.

Please be aware that the plant is fundamentally the same as it has been for at least the last ten years. Its physical condition and operations continue to be as they have been for that period of time. The plant, therefore, is essentially the same as it was when the loan from National City was initially made to Canton Drop Forge. Additionally, there has not been any claim made against the company, for at least the last ten years, based upon the environmental situation at the plant.

Enclosed, also for your information, please find a document titled "1990 Unregulated Sites Master List". While the document is self-explanatory, please note the description it gives for the priorities identified for the plants on the list. As you will note, a "low" priority has been assigned to the Canton Drop Forge plant and this, according to the document, means that the State has "little evidence to indicate a problem exists" at the plant.

If you desire further information regarding the plant please contact me.

Very truly yours,

Jerome Bressanelli, President
Canton Drop Forge

CDF004591

OLD FUEL STORAGE TANKS (3) NEAR
BOILER HOUSE

File Environmental

2(b)

(typed 5-14-56)

CAPACITY IN U.S. GALLONS FOR EACH 1 INCH IN 10' x 0 DIA. 16'-6" LONG

| INCHES | GALLONS | INCHES | GALLONS | INCHES | GALLONS | INCHES | GALLONS |
|--------|---------|--------|---------|--------|---------|--------|---------|
| 1 | 13 | 31 | 2024 | 61 | 5100 | 91 | 8145 |
| 2 | 15 | 32 | 2118 | 62 | 5207 | 92 | 8246 |
| 3 | 65 | 33 | 2212 | 63 | 5314 | 93 | 8348 |
| 4 | 100 | 34 | 2307 | 64 | 5421 | 94 | 8449 |
| 5 | 139 | 35 | 2403 | 65 | 5527 | 95 | 8549 |
| 6 | 182 | 36 | 2500 | 66 | 5634 | 96 | 8649 |
| 7 | 229 | 37 | 2598 | 67 | 5740 | 97 | 8749 |
| 8 | 277 | 38 | 2696 | 68 | 5846 | 98 | 8849 |
| 9 | 332 | 39 | 2795 | 69 | 5952 | 99 | 8949 |
| 10 | 388 | 40 | 2895 | 70 | 6057 | 100 | 9049 |
| 11 | 446 | 41 | 2995 | 71 | 6162 | 101 | 9149 |
| 12 | 506 | 42 | 3097 | 72 | 6266 | 102 | 9249 |
| 13 | 573 | 43 | 3199 | 73 | 6371 | 103 | 9349 |
| 14 | 639 | 44 | 3301 | 74 | 6475 | 104 | 9449 |
| 15 | 708 | 45 | 3405 | 75 | 6579 | 105 | 9549 |
| 16 | 777 | 46 | 3509 | 76 | 6683 | 106 | 9649 |
| 17 | 849 | 47 | 3613 | 77 | 6785 | 107 | 9749 |
| 18 | 923 | 48 | 3718 | 78 | 6887 | 108 | 9849 |
| 19 | 999 | 49 | 3822 | 79 | 6989 | 109 | 9949 |
| 20 | 1077 | 50 | 3927 | 80 | 7084 | 110 | 9996 |
| 21 | 1156 | 51 | 4032 | 81 | 7189 | 111 | 9652 |
| 22 | 1237 | 52 | 4138 | 82 | 7288 | 112 | 9707 |
| 23 | 1320 | 53 | 4244 | 83 | 7386 | 113 | 9755 |
| 24 | 1404 | 54 | 4350 | 84 | 7484 | 114 | 9802 |
| 25 | 1489 | 55 | 4457 | 85 | 7581 | 115 | 9845 |
| 26 | 1574 | 56 | 4563 | 86 | 7677 | 116 | 9881 |

CDF004592

RECEIVED

8
AUG 21 1985

CANTON DROP FORGE

August 19, 1985

also in Ohio EPA file
OhioEPA

JPB

Canton Drop Forge
P.O. Box 6902
4575 Southway St., S.W.
Canton, Ohio 44706

Dear Concerned Party:

Ohio EPA has completed the enclosed preliminary assessment as part of our ongoing process to identify and remedy hazardous materials problems in Ohio. We are providing you with a copy of this information because of your identified owner and/or operator status.

Ohio EPA will ultimately screen (or "preliminarily assess") over 800 sites included on U.S. EPA's Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) list of 22,000+ sites nationwide. This screening is based upon readily available information, and is used to prioritize sites for additional investigation as outlined in the National Contingency Plan. (See 40 CFR Part 300) The Unregulated Sites staff conduct additional activities based upon the priority assigned in the preliminary assessment (none, low, medium, high). A site inspection with sampling sufficient to characterize the site may follow the preliminary assessment. Actions subsequent to the site inspection - if warranted - include Superfund listing and remedial actions.

The preliminary assessments are put in our files when they are completed and sent to U.S. EPA. We are giving you this information to better enable you to address any possible inquiries from the public. We welcome any additional information or comments and ask that you contact the Unregulated Sites staff at the following offices:

| | | |
|-----------|---------------|--------------------------|
| Central | Columbus | 614/462-6733 or 462-8934 |
| Northeast | Twinsburg | 216/425-9171 |
| Southwest | Dayton | 513/449-6357 |
| Northwest | Bowling Green | 419/352-8461 |
| Southeast | Logan | 614/385-8501 |

You might also wish to contact our Public Interest Center at 1-614-466-8508.

Sincerely,


Steven H. White, Chief

Division of Solid & Hazardous Waste Management

cc: NEDO

RECEIVED

Canton Drop Forge
4575 Southway Street, SW
P.O. Box 6902
Canton, OH 44706
OHD 004-465-142

AUG 21 1985

CANTON DROP FORGE

Canton Drop Forge is located in the southwestern section of Canton, Stark County, Ohio in a commercial/industrial area outside the city's corporate boundary. Southway Street runs east/west between Penn Central railroad tracks to the north and U.S. 30/U.S. 62 to the south (USGS Quad. Canton, West - 68SW). Residential developments in the suburbs exist approximately 1/2 mile from the site.

Although Canton Drop Forge submitted a RCRA 3001 Notification as a Generator of Hazardous Wastes (8/18/80), their F010-quench oil sludge was later reclassified to include only those oils containing cyanides. The company's processes did not include the use of cyanides, thus their quench oil sludge was not contaminated by cyanides and their waste was considered non-hazardous (7/28/83 Inspection follow-up letter, OEPA). The company's other wastes are oils reclaimed from process wastewater and a non-hazardous scrubber sludge. Sludge disposal is at an off-site landfill.

Drums of waste lube oils were reported by the company as having been buried near their wastewater lagoons, approximately 15-18 years ago. Some of the drums were exposed and observed by OEPA Inspectors (6/30/83) to be leaking oily wastes. The lagoons were excavated by Canton Drop Forge to use for the evaporation and/or infiltration of process wastewaters. An oil skimmer collects oil for recycling from the first lagoon and the clarified water is then directed to the second.

Groundwater contamination was considered as a possible hazard on this P.A., however, no hazardous substances are known to have been placed in either lagoon or buried on-site. The lagoons (2) were dug with the intention for wastewater to come in contact with the permeable soils of the area for infiltration. Groundwater resources in Canton Drop Forge's vicinity are some of the best in the county (Groundwater Resources of Stark County, ODNR, 1979).

The company does not generate hazardous wastes and none of the information available in OEPA Northeast District office files indicates on-site disposal of hazardous substances. Canton Drop Forge does not appear to be a candidate for the NPL, however, a low priority is recommended for State/FIT investigations into the necessity of groundwater monitoring for the company's surface impoundments/lagoons.

Submitted by: Pam Wicks, DSHWM

Reviewed by: Gary Gifford, DSHWM

6/6/85

CDF004594



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

OH D004465142

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

CANTON DROP FORGE

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER

4575 SOUTHWAY ST. SW

03 CITY

CANTON

04 STATE 05 ZIP CODE

OH 44706

06 COUNTY

STARK

07 COUNTY CODE

151

08 CONG DIST

16

09 COORDINATES LATITUDE

40°46'45"N

LONGITUDE

081°23'45"W

Canton West, OH (68.5W)

10 DIRECTIONS TO SITE (Starting from nearest public road)

In Canton, OH; North/South I-77 to west on US 30/US 62 to the Gambinus Av. exit, north. Turn west on 17th; becomes Southway.

III. RESPONSIBLE PARTIES

01 OWNER (if known)

CANTON DROP FORGE

02 STREET (Business, mailing, residential)

P.O. BOX 6902 / 4575 SOUTHWAY

03 CITY

CANTON

04 STATE 05 ZIP CODE

OH 44706

06 TELEPHONE NUMBER

216 477-4511

07 OPERATOR (if known and different from owner)

Same as above

08 STREET (Business, mailing, residential)

09 CITY

10 STATE 11 ZIP CODE

12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL:

(Agency name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER:

(Specify)

☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: 8/18/80
MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103(c)) DATE RECEIVED: / /
MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

☒ YES

DATE

6/30/83
MONTH DAY YEAR

☐ NO

BY (Check all that apply)

☐ A. EPA

☐ B. EPA CONTRACTOR

☒ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S):

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1903

BEGINNING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Oily wastes (soluble)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Groundwater (Environment/Population)

V. PRIORITY ASSESSMENT

FIT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☒ C. LOW

(Inspect on time available basis)

☐ D. NONE

(No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Gary Gifford

02 OF (Agency/Organization)

OEPA, NEDO-DSHWM

03 TELEPHONE NUMBER

216 425-9171

04 PERSON RESPONSIBLE FOR ASSESSMENT

Pam Wicks

05 AGENCY

OEPA

06 ORGANIZATION

NEDO, DSHWM

07 TELEPHONE NUMBER

216 425-9171

08 DATE

6.5.85
MONTH DAY YEAR

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

| | | | | | | | | | | | | | | | | | |
|---|---|---|--|--------------------------------------|--|--|---|--|--|--|---------------------------------------|--|--|---|--|--|---|
| 01 PHYSICAL STATES (Check all that apply)
<input type="checkbox"/> A. SOLID
<input checked="" type="checkbox"/> B. POWDER, FINES
<input checked="" type="checkbox"/> C. SLUDGE
<input type="checkbox"/> D. OTHER _____
<i>(Specify)</i> | 02 WASTE QUANTITY AT SITE
<i>(Measures of waste quantities must be independent)</i>
TONS _____
CUBIC YARDS _____
NO OF DRUMS <u>1520</u> | 03 WASTE CHARACTERISTICS Check all that apply
<table border="0"> <tr> <td><input checked="" type="checkbox"/> 1. TOXIC</td> <td><input type="checkbox"/> 1F. SOLUBLE</td> <td><input type="checkbox"/> 1H. HIGHLY VOLATILE</td> </tr> <tr> <td><input checked="" type="checkbox"/> 2. CORROSIVE</td> <td><input type="checkbox"/> 2F. INFESTIONS</td> <td><input type="checkbox"/> 2H. EXPLOSIVE</td> </tr> <tr> <td><input checked="" type="checkbox"/> 3. RADIOACTIVE</td> <td><input type="checkbox"/> 3F. FLAMMABLE</td> <td><input type="checkbox"/> 3H. REACTIVE</td> </tr> <tr> <td><input type="checkbox"/> 4. PERSISTENT</td> <td><input type="checkbox"/> 4F. IGNITABLE</td> <td><input type="checkbox"/> 4H. INCOMPATIBLE</td> </tr> <tr> <td></td> <td></td> <td><input type="checkbox"/> 5H. NOT APPLICABLE</td> </tr> </table> | <input checked="" type="checkbox"/> 1. TOXIC | <input type="checkbox"/> 1F. SOLUBLE | <input type="checkbox"/> 1H. HIGHLY VOLATILE | <input checked="" type="checkbox"/> 2. CORROSIVE | <input type="checkbox"/> 2F. INFESTIONS | <input type="checkbox"/> 2H. EXPLOSIVE | <input checked="" type="checkbox"/> 3. RADIOACTIVE | <input type="checkbox"/> 3F. FLAMMABLE | <input type="checkbox"/> 3H. REACTIVE | <input type="checkbox"/> 4. PERSISTENT | <input type="checkbox"/> 4F. IGNITABLE | <input type="checkbox"/> 4H. INCOMPATIBLE | | | <input type="checkbox"/> 5H. NOT APPLICABLE |
| <input checked="" type="checkbox"/> 1. TOXIC | <input type="checkbox"/> 1F. SOLUBLE | <input type="checkbox"/> 1H. HIGHLY VOLATILE | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> 2. CORROSIVE | <input type="checkbox"/> 2F. INFESTIONS | <input type="checkbox"/> 2H. EXPLOSIVE | | | | | | | | | | | | | | | |
| <input checked="" type="checkbox"/> 3. RADIOACTIVE | <input type="checkbox"/> 3F. FLAMMABLE | <input type="checkbox"/> 3H. REACTIVE | | | | | | | | | | | | | | | |
| <input type="checkbox"/> 4. PERSISTENT | <input type="checkbox"/> 4F. IGNITABLE | <input type="checkbox"/> 4H. INCOMPATIBLE | | | | | | | | | | | | | | | |
| | | <input type="checkbox"/> 5H. NOT APPLICABLE | | | | | | | | | | | | | | | |

III. WASTE TYPE

| CATEGORY | SUBSTANCE NAME | Q1 GROSS AMOUNT | Q2 UNIT OF MEASURE | Q3 COMMENT |
|----------|-------------------------|-----------------|--------------------|----------------------------|
| SLU | SLUDGE | Unknown | gal. lbs | Material on Sludge |
| OLW | CHLY WASTE | 15-20 | Pounds | Material on 15-18 yrs. ago |
| SOL | SOLVENTS | | | |
| PSD | PESTICIDES | | | |
| OCC | OTHER ORGANIC CHEMICALS | | | |
| IOC | INORGANIC CHEMICALS | | | |
| ACD | ACIDS | | | |
| BAS | BASES | | | |
| MES | HEAVY METALS | | | |

IV. HAZARDOUS SUBSTANCES (See Appendix for TSPs frequently cited CAS numbers.)

[illegible]

V. FEEDSTOCKS (See Appendix for CAS Numbers)

| CATEGORY | 01 FEEDSTOCK NAME | 02 CAS NUMBER | CATEGORY | 01 FEEDSTOCK NAME | 02 CAS NUMBER |
|----------|-------------------|---------------|----------|-------------------|---------------|
| FDS | | | FDS | | |
| FDS | | | FDS | | |
| FDS | | | FDS | | |
| FDS | | | FDS | | |

VI. SOURCES OF INFORMATION (Cite specific references, e.g., State files, sample analysis, records, etc.)

RCRA Hazardous Waste file - Inspection Report, Impacts + re-sterilization of dumping in lagoon & drums
Solid Waste file - Pre RCRA activity - skids, boxes, etc. in lagoon
NPDES Archives - Lagoons not discussed - file was for industrial plant on 11th St. that closed 1983
Determined company not a RCRA facility



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
OH 0004465142

II. HAZARDOUS CONDITIONS AND INCIDENTS

| | |
|---|---|
| 01 <input checked="" type="checkbox"/> A. GROUNDWATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: <u>65,000 Approx</u> | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>The lagoons used for clarifying oily wastewaters are evaporation/infiltration designs - in contact with soils. No hazardous substances are known to have been placed in lagoons. The site is located in the area listed as one of the best for groundwater resources in Stark Co. Permeable sand & gravel deposits in deep buried valleys.</u> |
| 01 <input type="checkbox"/> B. SURFACE WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>There are no outlets to the lagoons - these were developed for a waste water system. (Excavated by Canton Drop Forge per "Operational Report" in Solid Waste file, June 1978)</u> |
| 01 <input type="checkbox"/> C. CONTAMINATION OF AIR
03 POPULATION POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>NA</u> |
| 01 <input type="checkbox"/> D. FIRE/EXPLOSIVE CONDITIONS
03 POPULATION POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>NA</u> |
| 01 <input type="checkbox"/> E. DIRECT CONTACT
03 POPULATION POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>NA Fenced around lagoons to prevent access</u> |
| 01 <input checked="" type="checkbox"/> F. CONTAMINATION OF SOIL
03 AREA POTENTIALLY AFFECTED: <u>Unknown</u>
(Acres) | 02 <input type="checkbox"/> OBSERVED (DATE: <u>6/30/83</u>) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>Drums of waste oil were buried near the evap/infiltration lagoons. Drums were observed leaking - oil saturated soils possible</u> |
| 01 <input checked="" type="checkbox"/> G. DRINKING WATER CONTAMINATION
03 POPULATION POTENTIALLY AFFECTED: <u>20</u> | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>Canton utilizes groundwater for both domestic drinking water & industrial use. Municipal wells are >3 miles from site. Unknown if private domestic wells are nearby, or if effects of oil lagoons are likely.</u> |
| 01 <input type="checkbox"/> H. WORKER EXPOSURE/INJURY
03 WORKERS POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>NA</u> |
| 01 <input type="checkbox"/> I. POPULATION EXPOSURE/INJURY
03 POPULATION POTENTIALLY AFFECTED: _____ | 02 <input type="checkbox"/> OBSERVED (DATE: _____) <input type="checkbox"/> POTENTIAL <input type="checkbox"/> ALLEGED
04 NARRATIVE DESCRIPTION
<u>NA</u> |



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

OH 004465142

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquid/leaking drums)
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☒ OBSERVED (DATE: 6/30/83)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

Leaking oil drums were observed - CEPA recommended clean up method in first inspection letter.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

NA

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

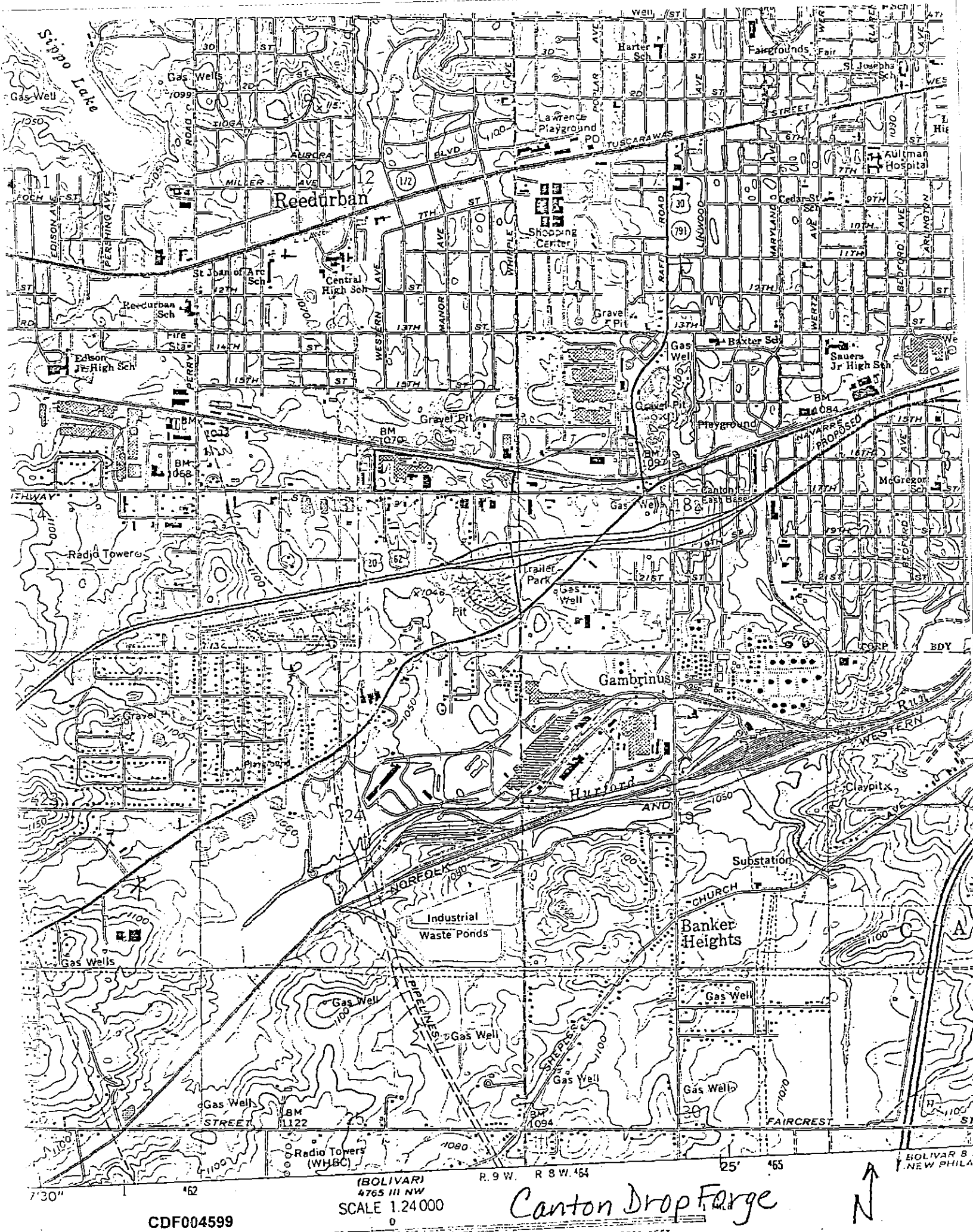
III. TOTAL POPULATION POTENTIALLY AFFECTED: 65,000 Approx.

IV. COMMENTS

No hazardous substances are known to be generated or disposed of on site. Oil lagoons may have some localized impact on groundwater, but does not require CERCLA activity by FIT. State may require groundwater monitoring for these SI's.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)

1980 Census for 3mi. radius, groundwater. Part Canton, Perry Twp., Meyers Lake, Perry Hts. Groundwater Resources of Stark Co., Walker, ODNR, 1979. Solid Waste file - documents lagoons & land use in fenced area. 1978. See Part 2 VI.



5, 2(b)

SOIL / GROUND WATER ASSESSMENT

ASSESSMENT
ITEMHAMMONTREEEARTH SCIENCENO. OF TEST BORINGS
ASSUMED
DEPTH OF BORING

8

30 FT

3

20/25 FT

MONITORING WELLS

SAME AS ABOVE
30 FT DEEP

6

30/35 FT DEEP

NO. OF SOIL SAMPLES
FOR ANALYSIS

REPRESENTATIVE

8 ? (ONE

FROM EACH TEST BORING)

6

three from Test
Boring, three from well boreSOIL & WATER
ANALYSES TO BE
RUN

TPH

VOLATILE ORGANIC COMPOUNDS

Semi-volatile " "

PCB

TCL - 23 metals

Total cyanide

total recoverable phenolics

TPH

VOLATILE ORGANIC COMPOUNDS

Semi-volatile " "

HEXAVALENT CHROMIUM

TCL - 23 metals

Total cyanide

PH

NO. OF WATER
SAMPLES FOR ANALYSIS

?

8 ? (one each well)

6

(one each well)

FINAL REPORT

YES

YES

COST

\$50,030

\$46,500 FOR BOTH
PHASE I & II(around \$41,000 FOR
SOIL/GROUND WATER
ASSESSMENT ONLY)

GEO physical

CDF004600

NONE

CONDUCTIVITY measurements

ENVIRONMENTAL COMPLIANCE 502(b)
AUDIT
PHASE 1

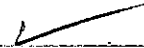
CRITERIA

HAMMONTREE

EARTH SCIENCES

FACILITY SURVEY

REVIEW OF physical
ELEMENTS IN MGMT OF
HAZARDOUS MATL,
FACILITY LAYOUT, CHEMICAL
PROCESSES EMPLOYED, CURRENT
EPA PERMITS, SITE
HISTORY, OWNERSHIP



COST

\$1450

COMPLIANCE
PROFILE

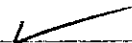
IDENTIFY regulatory req. that
APPLIES TO CDE
review OF: regulations, permits,
compliance schedules, settlement
agreements, orders etc

COST

\$2230

FACILITY INSPECTION:

review OF: practices for
waste storage & disposal,
HAZARDOUS MATL storage
practice, water & waste water
controls, emission areas,
operating practices

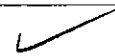


COST

\$1960

RECORDS REVIEW

REVIEW OF: environmental
control documents, all
govt reports & all agency
correspondence pertaining to
notices of violations, facility
inspections, past & pending
litigation etc

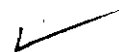


COST

\$1000

INTERVIEWS

INTERVIEW owners, operators
key personnel, outside
entities such as regulatory



COST

\$660

CRITERIA

HAMMONTREE

EARTH SCIENCE

AUDIT ANALYSIS

analysis of above
& conclusions

COST: \$1830

REPORT

YES

letter report

COST: \$1390

\$5,000 FOR BOTH
- ENVIRONMENTAL AUDIT &
SOIL/GROUNDWATER
ASSESSMENT

TOTAL COST OF

\$9,520

ENVIRONMENTAL AUDIT

\$4000 plus some
PORTION OF
\$5000 FOR REPORT

CONCLUSION:

HAMMONTREE'S PHASE 1 AUDIT
SEEMS MORE COMPREHENSIVE